

871d07

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. NICHOLSON JR., Circuit Court Judge

Case No. 2016-CP-10-03542
Appellate Case No.: 2017-002532

RECEIVED
AUG 27 2018
SC Court of Appeals

Bryan O'Keith Seabrook,

Appellant,

v.

Town of Mount Pleasant,

Respondent

MOTION TO FILE RESPONDENT'S FINAL BRIEF OUTSIDE FILING DEADLINES

Respondent hereby petitions this Court to permit the filing of Respondent's Final Brief outside the filing deadlines established by Rules 210 and 211 of the South Carolina Appellate Court Rules.

Based on the July 19, 2018 service date of the Record on Appeal, Respondent's Final Brief was required to be filed with this Court on August 8, 2018. Based on the August 2, 2018 mailing date, the undersigned counsel believes to be in compliance with Rule 262. However, the materials were not received by the clerk's office until after the deadline of August 8, 2016. Respondent respectfully requests this Court permit the filing of Respondent's Final Brief outside the filing deadlines established by Rules 210 and 211 of the South Carolina Appellate Court Rules, and that this Court accept Respondent's

Final Brief received by this Court on August 20, 2018 in fulfillment of the same.

Respectfully Submitted,



Timothy A. Domin
CLAWSON AND STAUBES, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492
843-577-2026
ATTORNEYS FOR RESPONDENT

August 20, 2018

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. NICHOLSON JR., Circuit Court Judge

Case No. 2016-CP-10-03542
Appellate Case No.: 2017-002532

RECEIVED
AUG 27 2018
SC Court of Appeals

Bryan O'Keith Seabrook,

Appellant,

v.

Town of Mount Pleasant,

Respondent


PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, he served counsel for the Appellant, with a copy of Respondent's Motion to File and Serve Respondent's Final Brief Outside Filing Deadlines by mailing copies of the same by United States Mail with sufficient first class postage to the following address:

Mark A. Peper, Esquire
548 Savannah Highway
Charleston, SC 29407

Charleston, South Carolina
August 27, 2018

CLAWSON and STAUBES, LLC



Timothy A. Domin
126 Seven Farms Drive, Suite 200
Charleston, South Carolina 29492-8144
843- 577-2026
Attorney for Respondent.

**CLAWSON
AND
STAUBES**
LLC

Timothy A. Domin
Licensed in SC
tdomin@clawsonandstaubes.com

August 22, 2018

File No.: 20162259.000

VIA US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211-1629

Re: Bryan O'Keith Seabrook vs. Town of Mount Pleasant
Case No.: 2016-CP-10-03542
Appellate Case No.: 2017-002532

RECEIVED
AUG 27 2018
SC Court of Appeals

Dear Sir/Madam:

Enclosed please find an original and one copy of Respondent's Motion to File Respondent's Final Brief Outside Filing Deadlines and Certificate of Service regarding the above-referenced case. After filing, please return the copy to me in the enclosed self-addressed stamped envelope. Should you have any questions, please do not hesitate to contact me.

Thank you very much for your attention to this matter.

Very truly yours,

CLAWSON and STAUBES, LLC



Timothy A. Domin

TAD/ajr
Enclosures

cc: Mark A. Peper, Esq.
(Via US Mail & w/enclosures)

**CLAWSON
STAUBES**

LLC

128 Savant Farms Drive, Suite 200
Charleston, SC 29492-4444

File #: 20162259.000

Hasler

FIRST-CLASS MAIL

08/23/2018

US POSTAGE

\$00.68⁰



ZIP 29492
011D11621707

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211-1629

RECEIVED

AUG 27 2018

SC Court of Appeals

